

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

KELSEY VANDERBY, an individual,
Plaintiff,

Hon. Paul L. Maloney
Case No. 1:21-cv-637

v.

KDN CONSTRUCTION GROUP, LLC, a
Domestic Limited Liability Company,
and **DEREK NIBLICK**,
an individual, jointly and severally,
Defendants.

AVANTI LAW GROUP, PLLC Robert Anthony Alvarez (P66954) Attorney for Plaintiff 600 28th St. SW Wyoming, MI 49509 (616) 257-6807 ralvarez@avantilaw.com	
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MOTION FOR ENTRY OF DEFAULT JUDGMENT

Plaintiff Kelsey Vanderby, through her attorneys, Avanti Law Group, PLLC, requests that the court enter the attached Proposed Default Judgment in the amount of three thousand five hundred thirty nine dollars and six cents (\$3,539.06) against Defendants KDN Construction Group, LLC and Derek Niblick, pursuant to Federal Rule of Civil Procedure 55(b). *Exhibit A*. In support of this request Plaintiff relies upon the record in this case and the affidavit submitted herein. *Exhibit B*.

Date: October 5, 2021

Respectfully submitted,

/s/ Robert Anthony Alvarez
Robert Anthony Alvarez (P66954)
Avanti Law Group, PLLC
Attorneys for Plaintiff